

# Exhibit A



Deposition of:  
**Michael Streiff , M.D.**

*July 12, 2017*

In the Matter of:  
**In Re: Bard IVC Filters Products  
Liability**

**Veritext Legal Solutions**

1075 Peachtree St. NE , Suite 3625

Atlanta, GA, 30309

800.808.4958 | [calendar-atl@veritext.com](mailto:calendar-atl@veritext.com) | 770.343.9696

## In Re: Bard IVC Filters Products Liability

Page 277

1 Q. And, and you are not basing that  
2 statement on any kind of FDA regulation standard or  
3 some law. That's just kind of a personal opinion?

4 A. Yeah, that's after looking at those  
5 documents.

6 MR. O'CONNOR: Object to the form of the  
7 question.

8 THE WITNESS: Sorry.

9 BY MR. LERNER:

10 Q. And, and when you say that manufacturers  
11 should continuously apprise physicians of certain  
12 information, again, that's not based on any  
13 particular regulation, standard or law. It's based  
14 on your personal opinion?

15 MR. O'CONNOR: Form.

16 THE WITNESS: True.

17 BY MR. LERNER:

18 Q. And when you use the term continuously  
19 apprise, are you saying that manufacturers should  
20 be providing information to doctors how often?

21 A. I would say that if you have a -- you  
22 know, obviously, I'm -- this is -- I'm an outsider.  
23 The whole FDA, the vice pros, you know, approval  
24 process or drug approval process, because I haven't  
25 been involved with that either, but if you have --

## In Re: Bard IVC Filters Products Liability

Page 278

1 if a company has a reasonable certainty that their  
2 drug or device may have problems that need to be  
3 corrected, they ought to, as soon as they feel  
4 reasonably certain about that ought to let, you  
5 know, let providers know, particularly ones that  
6 are placing the devices in this case.

7 Q. And, again, you're offering opinions,  
8 your personal opinions that you and Dr. Garcia  
9 have?

10 A. True.

11 MR. O'CONNOR: Object.

12 THE WITNESS: That's all personal -- oh,  
13 sorry. All --

14 MR. O'CONNOR: I object to the form of  
15 the question.

16 THE WITNESS: All personal opinions based  
17 on reading the Kessler report.

18 BY MR. LERNER:

19 Q. Okay. And since you're not an expert in  
20 FDA regulations, I assume you are not aware of what  
21 information a device company can or cannot provide  
22 to the public?

23 MR. O'CONNOR: Form.

24 THE WITNESS: That is true, yeah.

25 BY MR. LERNER: